

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

-----  
ETHICON ELECTION WAVE CASES  
LISTED IN PLAINTIFFS' EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE REGARDING  
JOHN R. WAGNER, M.D. FOR ELECTION WAVE**

In response to Plaintiffs' Notice of Adoption of their prior Daubert motion to exclude Dr. John R. Wagner (Dkt. 7326), Defendants Ethicon, Inc., Ethicon LLC, and Johnson & Johnson (collectively "Ethicon") hereby adopt and incorporate by reference their *Daubert* response in relation to Dr. Wagner filed by Ethicon in Wave 6, Dkt. 4920. Ethicon respectfully requests that the Court deny Plaintiffs' motion, for the reasons expressed in its Wave 6 response briefing.

Respectfully submitted,

/s/ William M. Gage

William M. Gage (MS Bar No. 8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com)

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar No. 5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338  
(304) 414-1800  
[srobinson@tcspllc.com](mailto:srobinson@tcspllc.com)

COUNSEL FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I certify that on this date, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage